North Coast Timber Supply Area
Summary of Public Input
B.C. Ministry of Forests

North Coast, Summary of Public Input

- North Coast Timber Supply Area, Summary of Public Input
- Background
- Public Review Process and Response
- Public Input
  - Timber Supply Analysis
    - Technical critique
    - Other Public Input
  - Socio-Economic Assessment
  - Public Discussion Paper
  - Related processes and issues
- Appendix 1
  - Submissions received by the North Coast Forest District
  - Submissions received by the Nisga'a Tribal Council

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North Coast Timber Supply Area, Summary of Public Input

North Coast Timber Supply Area

Timber Supply Review

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the North Coast Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Background

As part of the review of timber supply in the North Coast Timber Supply Area, the British Columbia Ministry of Forests distributed a *Public Discussion Paper* and two technical reports, the *Timber Supply Analysis Report* and the *Socio-Economic Assessment*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the North Coast Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Ministry of Forests and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act)* can be reviewed at the North Coast Forest District office in Prince Rupert.

Public Review Process and Response

North Coast District Staff actively solicited public input on the Timber Supply Review in the North Coast Timber Supply Area through the following actions:

- direct mail-out of the three documents to 40 organizations and businesses active within the North Coast Timber Supply Area or adjacent timber supply areas. The *Public Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager
- information sessions were held with representatives from the public, timber industry and local governments (see Table 1)
- two open houses were held
- one radio interview was provided
- newspaper articles were encouraged

As Table 1 shows, about 75 individuals attended the public information sessions and open houses. The North Coast Forest District received eight written submissions, including a review of the Ministry of Forests' timber supply analysis commissioned by North Coast licensees (*North Coast Timber Supply Area Timber Supply Review Audit,* September 1994). It is referred to as the technical critique in this summary. Submissions received are listed in Appendix 1 of this summary.

Activities (No. of participants)	Date (1994)
Information sessions	
Public, Prince Rupert (16)	January 24, 1997
Prince Rupert City Council (7)	January 24, 1997
Forest industry (4)	ongoing
Prince Rupert City Council (6)	October 24, 1997
First Nations	
Kitamaat Village Council (5)	January 24, 1997
Nisga'a Tribal Council (12)	January 31, 1997
Nisga'a Tribal Council, Terrace (2)	March 3, 1997
Nisga'a Tribal Council, New Aiyansh (10)	March 29, 1997
Open houses	

Prince Rupert (5)	March 25, 1997
Prince Rupert (8)	October 24, 1997

Table 1: Participation in public information activities

The Nisga'a Tribal Council has been involved in the Timber Supply Review for the North Coast in accordance with their Interim Protection Measures Agreement with Canada and British Columbia. Several meetings were held with the Council throughout the process. The Nisga'a views on current forest management practices and their impacts on the timber supply were presented in an appendix to the *Public Discussion Paper*. The Nisga'a included a response form with this Appendix to solicit public input. One submission was received by the Nisga'a and has been incorporated into this summary.

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the North Coast Timber Supply Area is summarized under the following headings:

- timber supply analysis
- socio-economic assessment
- public discussion paper

Public input on other ongoing government processes or other issues that may influence the timber supply in the North Coast Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Technical critique

The technical critique states that redefining analysis units allows the current harvest to be maintained for 70 years (compared to 60 years in the *Timber Supply Analysis Report*) before declining to a long-term harvest level of 361,000 cubic metres per year (20 per cent above the *Timber Supply Analysis Report* base case).

The critique suggests the timber growth projections used in the Ministry of Forests analysis are conservative because:

- the timber productivity estimates (site indexes) based on existing over-mature forests are lower than would be expected for regenerated forests on the same sites; the critique maintains that site index data are unreliable on 97 per cent of the land base

- the effects of density and competition control treatments are not considered

The critique estimates that the long-term harvest level will be 475,000 cubic metres per year when projected timber volumes for managed forests are applied (58 per cent above the *Timber Supply Analysis Report* base case).

The critique notes the timber harvesting land base (areas considered feasible or economical to harvest) will vary with market conditions. Current increases in log prices are expected to increase the operable area, thereby increasing the long-term harvest level. Increasing the currently defined operable land base by nine per cent results in a long-term harvest level of 403,000 cubic metres per year.

The critique also states that the reduction of 8.3 per cent of the land base for roads and landings is too high. By reducing this to six per cent, the long-term harvest level can be increased by about two per cent.

The critique predicts the combined impacts of redefined analysis units, increases in site index values and land base, a decrease in area for roads and removal of the constraints for integrated resource management, would allow the current harvest to be maintained for 170 years before declining to a long-term harvest level of 518,000 cubic metres per year.

The critique notes the current harvest level can be sustained the with the additional management constraints of the Forest Practices Code.

Other Public Input

- **Size of the timber harvesting land base**

One industry submission suggests the economic situation has improved since the timber harvesting land base was mapped. It suggests the timber harvesting land base can be increased by at least five per cent based on today's market prices.

Another submission suggests a moratorium be placed on logging the smaller islands along the north coast and that the vista across from Prince Rupert be taken out of the timber supply area.

A third submission notes the timber harvesting land base can change over time and that it is important that all species and age classes be available over time.

The Ministry of Environment, Lands and Parks suggests that the *Timber Supply Analysis Report* projections do not provide for maintenance of biodiversity or old growth, beyond the protection offered by streamside buffers. Furthermore, the percentage of the land base removed as streamside buffers may be too low to protect riparian habitats.

- **Old growth values**

One submission suggests there will not be any high quality old growth timber for future harvesting. The respondent proposes setting aside old growth forests since their increased value will exceed increases in interest rates or stock exchange indexes, especially as world demand increases.

One respondent requests a sensitivity analysis of a 300-year rotation period in order to examine the protection of old growth values. The respondent claims that old growth in adjacent non-productive areas does not adequately represent old growth values because the non-productive areas are part of a different ecosystem.

Another respondent suggests longer rotations are required to preserve older trees which may be valuable as wildlife trees or pest traps. Furthermore, older trees may release hormones to warn younger, neighbouring trees of potential attack by infectious organisms.

- **Forest management practices**

The Ministry of Environment, Lands and Parks notes that a one-pass harvest system does not protect old growth and biodiversity across the landscape. Harvesting must be spread over the landscape and over time to maintain the diverse habitats required for wildlife populations.

Socio-Economic Assessment

- **Employment and community impacts**

The following concerns are raised in individual submissions:

• the *Socio-Economic Assessment* provided good baseline information, but the relationship between wood volume and jobs is too simplistic

• current harvest levels are creating a dependency on unsustainable royalties and employment within the province

• the *Socio-Economic Assessment* lacked a reference to the past and future effects technology has on forest industry jobs per cubic metre

• if the major forest license holders are given the bulk of the apportionment, employment will decrease because their operations are less labour-intensive. If more labour-intensive and environmentally sound harvesting techniques were used, employment could increase with a decreased allowable annual cut

• the fact that only 34 per cent of the total employment generated by the allowable annual cut occurs within the North Coast Timber Supply Area is described as shocking. The respondent suggests however, that only a specialized, value-added mill, such as one that utilizes cypress, can compete in Prince Rupert

• communities outside the North Coast Timber Supply Area will be affected by changes in timber supply in the North Coast. In addition, the pulpmill in Prince Rupert will be affected to a great extent by decisions in other timber supply areas

• Forest Renewal B.C. will benefit the North Coast Timber Supply Area bycreating employment and through its plan to enhance timber supply

- **Environmental impacts**

The Ministry of Environment, Lands and Parks is concerned that an elevated harvest scenario will limit options for protecting

riparian areas and certain old growth valley bottom habitats.

- **First Nations**

One respondent questions the accuracy of the socio-economic assessment, citing three errors:

- the Kitamaat Village Council itself did not communicate its concerns
- Kitamaat Village is not heavily dependent on the forest industry
- the five eulachon-producing rivers are in the Kalum Forest District, not the North Coast

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Public Discussion Paper

Issues raised in the *Public Discussion Paper* prompted some public input.

- **Allowable annual cut adjustment**

Several comments were received about whether and how the allowable annual cut should be adjusted. Input varies from a suggestion that an immediate reduction be made to support for maintenance of the current cut.

One submission recommends the findings of the technical critique be incorporated into the allowable annual cut decision.

A forest industry submission, referring to the results of the technical critique, recommends the chief forester maintain the existing allowable annual cut until the next timber supply review is conducted. This submission also suggests a gradual decrease in the cut to the long-term harvest level, providing operational stability through the use of Forest Renewal BC funding to achieve future improvements in operability and timber productivity.

One respondent suggests decreasing the allowable annual cut immediately toward a fully sustainable timber supply level.

Another respondent expresses the opinion that harvesting constraints resulting from the Forest Practices Code can be absorbed at the level of the current allowable annual cut.

One submission notes inaccuracies in factors that affect the long-term harvest level and possibly the current allowable annual cut. These factors are site index, operable area and losses to roads.

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Related processes and issues

Comments on other issues or ongoing government processes are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Forest management practices**

One submission requests that more of the allowable annual cut be allocated to selective logging, woodlots and to more labour intensive and environmentally sound harvesting techniques. Another suggests establishing a number of test forests for selective logging to assess its effects on slope stability and growth rates.

One respondent cautions that results of studies elsewhere will not likely be transferable to the North Coast Timber Supply Area.

- **First Nations land claims**

One submission notes the Ministry of Forests and specifically the chief forester must co-manage the forests with the First Nations until land claims are settled. The allowable annual cut should be determined by consensus with First Nation leaders.

Appendix 1

Submissions received by the North Coast Forest District

Local government
Kitamaat Village Council

Government agencies
Ministry of Environment, Lands and Parks, Terrace

Interest groups
Green Party of B.C., Prince Rupert

Industry
International Forest Products Limited, Vancouver
B & I Forest Products Ltd., Burnaby
Pacific Cascade Consultants Ltd., Terrace
Timberline Forest Industry Consultants (*North Coast Timber Supply Area Audit*, September 1994).
Commissioned by North Coast licensees

Individuals
One submission

Submissions received by the Nisga'a Tribal Council

Interest groups
Green Party of B.C., Prince Rupert